## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Greater Houston Transportation Company;
Fiesta Cab Company; Houston Transportation
Services, LLC; National Cab Co., Inc.;
Pasadena Taxi Co., Inc.; American Mementum
Group LLC; Atlas Limousine LLC; CTI
Transportation, LLC; Liban Incorporated;
Avanti Int'l Transportation, Ltd.; First Priority
Transportation, LLC; Lone Star Executive
Limousine, LLC; Dawit Sahle; Mohamed
Samater; Mersha Ayele; Moses A. Tesfay;
Melaku Shumie; Abraham Tarkegne; Kidane
Ghebreslassie; Mohamed Didi; Champion Cab
Co.; Greater San Antonio Transportation
Company; Enterprise Transportation Inc.

CIVIL ACTION NO. 14-941

Plaintiffs,

VS.

Uber Technologies, Inc.; and Lyft, Inc.,

Defendant.

## DECLARATION OF AMIT B. PATEL IN SUPPORT OF DEFENDANT UBER TECHNOLOGIES, INC.'S RESPONSE IN OPPOSITION TO PLAINTIFFS' REQUEST FOR TEMPORARY RESTRAINING ORDER

Pursuant to 28 U.S.C. § 1746, I, Amit B. Patel, hereby declare as follows:

- 1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan LLP, counsel of record for Defendant Uber Technologies, Inc. ("Uber") in the above-captioned case.
- I submit this declaration in support of Uber's Response In Opposition To
   Plaintiffs' Request For Temporary Restraining Order.

- 3. Attached hereto as Exhibit A is a true and correct copy of City of Houston

  Department of Administration & Regulatory Affairs, *Chapter 46 Vehicles for Hire Proposed Amendments* (Apr. 18, 2014), retrieved from http://www.houstontx.gov/ara/regaffairs/

  Chapter\_46\_Vehicles\_for\_Hire\_Proposed\_Amendments\_April\_2014.pdf on Apr. 20, 2014.
- 4. Attached hereto as Exhibit B is a true and correct copy of City of Houston

  Department of Administration & Regulatory Affairs, *Overview: Proposed Changes to Chapter*46 of the Code of Ordinances Related to Vehicles-for-Hire (Apr. 22, 2014), retrieved from http://www.houstontx.gov/ara/regaffairs/Final\_Chapter\_46\_Joint\_Committee\_Presentation\_

  April22 2014.pdf on Apr. 20, 2014.
- 5. Attached hereto as Exhibit C is a true and correct copy of City of Houston
  Department of Administration & Regulatory Affairs, *Press Release: Houston's Concern With*Lyft Expands From Illegal Operations To Safety Issues (Mar. 12, 2014), retrieved from http://www.houstontx.gov/ara/20140312.html on Apr. 20, 2014.
- 6. Attached hereto as Exhibit D is a true and correct copy of Vianna Davila, *Mayor on board with ride sharing*, San Antonio Express-News, Mar. 28, 2014, retrieved from http://www.expressnews.com/news/local/article/Mayor-on-board-with-ride-sharing-5358644.php on Apr. 20, 2014.
- 7. Attached hereto as Exhibit E is a true and correct copy of Hr'g Tr. 160:8–161:4, *Yellow Group* (N.D. Ill. Apr. 29, 2013).
- 8. Attached hereto as Exhibit F is a true and correct copy of Editorial, *Yellow Cab doesn't get it*, Houston Chronicle, Feb. 25, 2014, retrieved from http://www.chron.com/opinion/editorials/article/Yellow-Cab-doesn-t-get-it-5267560.php on Apr. 20, 2014.

- 9. Attached hereto as Exhibit G is a true and correct copy of Editorial, *Free Markets*, Houston Chronicle, Apr. 15, 2014, retrieved from http://www.chron.com/opinion/editorials/article/Free-markets-5405163.php on Apr. 20, 2014.
  - 10. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON April 20, 2014 in ROATÁN, HONDURAS

By Sand B. Pall

Amit B. Pate